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Attorneys for Defendants
LSI Corporation and
Agere Systems LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BARNES & NOBLE, INC. and
BARNESANDNOBLE.COM LLC,

Plaintiffs,

v.

LSI CORPORATION and
AGERE SYSTEMS LLC,

Defendants.

Case No. 11-cv-02709 EMC

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
DEFENDANTS' MOTION FOR LEAVE
TO AMEND INFRINGEMENT
CONTENTIONS AND
COUNTERCLAIMS [DKT. NO. 200]**

Trial Date: None set

Pursuant to Local Rule 6-2, Plaintiffs Barnes & Noble, Inc. and barnesandnoble.com llc
("Plaintiffs") and Defendants LSI Corporation and Agere Systems LLC ("Defendants")
(collectively, the "Parties"), stipulate as recited below.

Regarding Defendants' Motion for Leave to Amend Infringement Contentions and
Counterclaims (Dkt. No. 200) ("Motion for Leave"), the parties stipulate that the Motion for

1 Leave may be GRANTED by the Court.

2 The Parties further stipulate to consolidated claim construction proceedings for the
3 Asserted Patents¹ and Supplemental Patents², following service of Patent Local Rule disclosures
4 for the Supplemental Patents.

5 The Parties propose the following schedule for Patent Local Rule disclosures regarding
6 the Supplemental Patents and for consolidated claim construction briefing, tutorial and hearing
7 with respect to disputed claim terms for construction in both the Asserted Patents and the
8 Supplemental Patents for the Court's consideration:

9	May 20, 2013:	Defendants to serve and file amended counterclaims
10	June 20, 2013:	Plaintiffs to serve and file a response to Defendants' amended
11		counterclaims
12	July 1, 2013:	Defendants to serve infringement contentions and disclosures
13		pursuant to Patent L.R. 3-1 and 3-2 related to Supplemental Patents
14	September 13, 2013:	Plaintiffs to serve invalidity contentions and disclosures pursuant to
15		Patent L.R. 3-3 and 3-4 related to Supplemental Patents
16	September 27, 2013:	Parties to exchange proposed terms for construction related to
17		Supplemental Patents
18	October 18, 2013:	Parties to exchange of preliminary claim constructions and extrinsic
19		evidence related to Supplemental Patents
20	November 12, 2013:	Parties to serve and file joint claim construction and prehearing
21		statement related to Asserted and Supplemental Patents
22	January 3, 2014:	Defendants to serve and file opening claim construction brief
23		related to Asserted and Supplemental Patents
24	January 24, 2014:	Plaintiffs to serve and file responsive claim construction brief
25		related to Asserted and Supplemental Patents
26	February 14, 2014:	Defendants to serve and file reply claim construction brief related
27		to Asserted and Supplemental Patents
28	February 24, 2014:	Plaintiffs to serve and file surreply claim construction brief related

¹ The Asserted Patents are: U.S. Patent No. 5,670,730, U.S. Patent 6,452,958, U.S. Patent No. 6,707,867, U.S. Patent No. 5,546,420, and U.S. Patent No. 5,920,552.

² The Supplemental Patents are: U.S. Patent No. 6,982,663, U.S. Patent No. 5,870,087, U.S. Patent No. 5,568,167, U.S. Patent No. 5,452,006, and U.S. Patent No. 8,041,394.

FENWICK & WEST LLP
ATTORNEYS AT LAW
MOUNTAIN VIEW

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to Asserted and Supplemental Patents; claim construction discovery cutoff

~~Week of March 10, 2014:~~ Technical tutorial related to Asserted and Supplemental Patents, subject to the Court's availability
3/10/14 at 2:30 p.m.

3/11/14 at 3:00 p.m.
~~Week of March 24, 2014:~~ Claim construction hearing related to Asserted and Supplemental Patents, subject to the Court's availability
3/24/14 at 2:30 p.m.

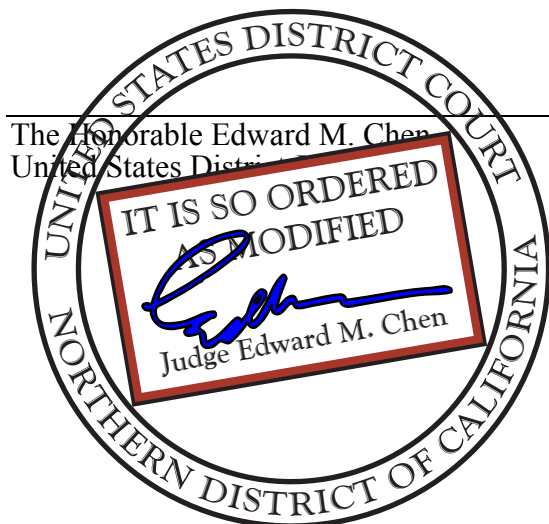
3/25/14 at 3:00 p.m.
Dated: May 15, 2013 FENWICK & WEST LLP

By: /s/ Virginia K. DeMarchi
Virginia K. DeMarchi
Attorneys for Defendants
LSI Corporation and Agere Systems LLC

Dated: May 15, 2013 QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Carl G. Anderson
Carl G. Anderson
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Barnes & Noble, Inc. and
barnesandnoble.com llc

PURSUANT TO STIPULATION, IT IS SO ORDERED. (as modified above)



ATTESTATION PURSUANT TO GENERAL ORDER 45

Pursuant to General Order No. 45, § X(B), regarding signatures, I attest under penalty of perjury that the concurrence in the filing of this document has been obtained from its signatories.

Dated: May 15, 2013

FENWICK & WEST LLP

By: /s/Virginia K. DeMarchi
Virginia K. DeMarchi
Attorneys for Defendants
LSI Corporation and Agere Systems LLC

FENWICK & WEST LLP
ATTORNEYS AT LAW
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